

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION**

TROY NOEL, both individually and on behalf and as natural tutor of his minor children, ALEX NOEL and BRANDEN NOEL, and also on behalf of his deceased wife, AMY NOEL,

Plaintiff,

vs.

STERLING AUTOMOVIE GROUP,  
INC., KIA MOTORS CORPORATION,  
and HYUNDAI MOBIS CO., LTD.,

Defendants.

**CIVIL ACTION NO. 6:15-cv-02469**

**JUDGE RICHARD T. HAIK, SR.**

**MAGISTRATE JUDGE PATRICK J.  
HANNA**

**MOTION TO REMAND**

**NOW INTO COURT**, through undersigned counsel, comes plaintiff, Troy Noel<sup>1</sup>, who respectfully moves the Court to remand this matter back to the 16<sup>th</sup> Judicial District Court for the Parish of Iberia, State of Louisiana, on the grounds that said matter was improvidently removed by Kia Motors America, Inc. and, therefore, plaintiff seeks remand pursuant to 28 U.S.C. §1447(C). The bases for this MOTION TO REMAND are more fully set forth in the attached MEMORANDUM IN SUPPORT OF PLAINTIFF'S MOTION TO REMAND.

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<sup>1</sup> Appearing both individually and on behalf and as natural tutor of his minor children, Alex Noel and Branden Noel, and also on behalf of his deceased wife, Amy Noel.

This 2nd day of November, 2015.

Respectfully submitted,

/s/ James C. Klick

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Attorneys for Plaintiff TROY NOEL,  
both individually and on behalf and as  
natural tutor of his minor children,  
ALEX NOEL and BRANDEN NOEL,  
and also on behalf of his deceased wife,  
AMY NOEL

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that the above and foregoing has been filed electronically with the Clerk of Court of the United States District Court for the Western District of Louisiana by using the CM/ECF System, which will send a notice of electronic filing to counsel of record, this 2nd day of November, 2015.

/s/ James C. Klick